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UNITED PUBLIC WORKERS,
AFSCME, LOCAL 646, AFL-CIO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

JEANNE ENDO,)	CIVIL NO. CV03-00563 LEK
)	
Plaintiff,)	DEFENDANT UNITED PUBLIC
)	WORKERS' PROPOSED CONCISE
vs.)	INTRODUCTORY STATEMENT
)	OF CASE; CERTIFICATE OF
UNITED PUBLIC WORKERS,)	SERVICE
AFSCME LOCAL 646, AFL-CIO,)	
)	
Defendant,)	
)	
vs.)	TRIAL DATE: May 13, 2008
)	
GARY W. RODRIGUES,)	
)	
Third-Party Defendant.)	
)	
)	

DEFENDANT UNITED PUBLIC WORKERS' PROPOSED CONCISE
INTRODUCTORY STATEMENT OF CASE

Defendant United Public Workers, AFSCME Local 646, AFL-CIO ("UPW") proposes that the concise introductory statement of the case below be read to the jury.

This is a sexual harassment case. Plaintiff Jeanne Endo alleges that she was sexually harassed while working for Defendant United Public Workers, AFSCME Local 646, AFL-CIO, known as UPW. Ms. Endo alleges that the former State Director of UPW, Third-Party Defendant Gary Rodrigues, sexually harassed her and also retaliated against her after she filed her harassment complaint. Mr. Rodrigues denies Ms. Endo's allegations. UPW denies any liability to Ms. Endo and asserts that to the extent it has to pay anything to Ms. Endo, then Mr. Rodrigues must reimburse UPW. Mr. Rodrigues denies UPW's reimbursement claim and asserts that UPW must reimburse his attorney's fees and court costs.

DATED: Honolulu, Hawaii, April 29, 2008.

/s/ Charles A. Price

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